

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

BOBBIE ADAMS

PLAINTIFF

v.

CIVIL ACTION NO. 3:24cv236-KHJ-MTP

SHERIFF BRYAN BAILEY, et al.

DEFENDANTS

MOTION FOR SUMMARY JUDGMENT

NOW COME Defendants, Rankin County, MS, Sheriff Bryan Bailey, and K9 Officer Tony Shack, by and through counsel, and move this Court for summary judgment by stating as follows:

1. Due to the circumstances surrounding Plaintiff's arrest on May 1, 2021 – including but not limited to the fact that after Adams sold methamphetamine to a CI and at a time when he was suspected of being armed and dangerous, he then fled on foot into the woods and hid in a ditch at night – the use of a K9 unit to detain Plaintiff was not objectively unreasonable.
2. Sheriff Bailey and Shack are entitled to qualified immunity and all claims against them should be dismissed.
3. There is no evidence to support a *Monell* claim against Rankin County and all claims against it should be dismissed.
4. There is no evidence to support a § 1985(3) civil conspiracy claim against these Defendants, and this claim is barred by the intra-corporate conspiracy doctrine.

5. Based on all legal precedent and analysis in their accompanying Memorandum of Authorities, Rankin County, Sheriff Bailey, and Shack submit that they are entitled to judgment pursuant to Rule 56.

6. These Defendants rely upon and submit the following exhibits in support of their instant motion:

- a. **Exhibit 1** – Rankin County Records
- b. **Exhibit 2** – Shack Affidavit
- c. **Exhibit 3** – Dispatch Audio (Conventionally Filed)
- d. **Exhibit 4** – Medical Records
- e. **Exhibit 5** – Sentencing Order
- f. **Exhibit 6** – Training Records

WHEREFORE, PREMISES CONSIDERED, Rankin County, Sheriff Bryan Bailey, and Tony Shack pray that this Court grant their instant motion and dismiss any and all claims against them with prejudice.

RESPECTFULLY SUBMITTED, this 30th day of June, 2025.

**RANKIN COUNTY, SHERIFF BRYAN BAILEY, &
TONY SHACK - DEFENDANTS**

BY: /s/ Jason E. Dare
JASON E. DARE

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